

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

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IN RE:

J.R. INSULATION SALES AND
SERVICE, INC.

Debtor



CASE NO. 03-02050 (GAC)

CHAPTER 11

**MOTION INFORMING AMENDMENT OF TERMS AND CONDITIONS
OF ENGAGEMENT OF SPECIAL COUNSEL AND REQUEST FOR ORDER TO
REFLECT SAID AMENDMENT**

TO THE HONORABLE COURT:

Comes now Attorney Norah E. Fernández-Vallejo, the Special Counsel, and very respectfully states and prays:

1. On August 11, 2006, J.R. Insulation Sales and Service, Inc. (the Debtor) filed an Application for Appointment of Special Counsel to employ the undersigned attorney as counsel to Debtor in the case styled Milagros González Ramos v. J.R. Insulation Sales & Services, José Enrique Ruiz Vázquez, Israel Vélez y Fulana de Tal y la Sociedad Legal de Bienes Gananciales Compuesta por Ambos, Civil Number CFPE 2006-0001 currently pending before the Commonwealth of Puerto Rico, Court of First Instance, Hatillo Section.

2. On August 15, 2006, this Honorable Court entered an Order authorizing Debtor to employ the undersigned.

3. Subsequent to this Honorable Court's order, the U.S. Trustee has expressed an objection in regards to the time in which the invoices submitted by the Special Counsel would be due. The undersigned Special Counsel has agreed to

Motion to inform Amendment of Terms and Conditions
of Engagement of Special Counsel

2

amend its engagement with Debtor to reflect that invoices will be submitted to the Court every 120 days and will be paid upon authorization of the Court.

4. It is hereby requested from this Honorable Court to enter an Order reflecting the aforementioned amendment of paragraph number 4 of the Application for Employment of Special Counsel to the effect that invoices from Special Counsel will be submitted to the Court every 120 days and will be paid upon authorization of the Court.

WHEREFORE, it is respectfully prayed that an order be entered amending the order granting the appointment of the Special Counsel to reflect that invoices from Special Counsel will be submitted to the Court every 120 days and will be paid upon authorization of the Court.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I have sent a copy of this motion to Francisco Moya-Huff, Esq., counsel for debtor and to the U.S. Trustee.

In San Juan, Puerto Rico, this 14th day of September, 2006.

**ALVARADO, VIÑAS & FERNÁNDEZ
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